



Air Quality Permitting Statement of Basis

May 25, 2006

Permit to Construct No. P-050417

**Noffsinger Manufacturing Co., Inc.
Filer, ID**

Facility ID No. 083-00058

Prepared by:

**Natalie DelRio, Associate Engineer
TECHNICAL SERVICES DIVISION**

FINAL

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURES	3
1. PURPOSE	4
2. FACILITY DESCRIPTION	4
3. FACILITY / AREA CLASSIFICATION	4
4. APPLICATION SCOPE	4
5. PERMIT ANALYSIS	4
6. PERMIT FEES	5
7. PERMIT REVIEW	5
8. RECOMMENDATION	6

Acronyms, Units, and Chemical Nomenclatures

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CO	carbon monoxide
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
NO_x	nitrogen oxides
PM₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SO_x	sulfur oxides
µg/m³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

2. FACILITY DESCRIPTION

Noffsinger Manufacturing Co., Inc. (Noffsinger) operates a chain link fabrication process at their facility located in Filer, Idaho. The fabrication involves part shaping, forming, and tempering of the steel. Two exempt natural gas-fired furnaces provide the heat for the shaping and forming processes (see January 19, 1996, memorandum from Gary Gates to Martin Bauer for the exemption determination). A quench tank is used for the tempering process. The quenching agents will be mixed in the quench tank and serve as a bath for the hot steel links; the quenchant prevents the links from distorting and cracking as they cool and also aids in the hardening phase of the tempering process.

3. FACILITY / AREA CLASSIFICATION

Noffsinger Manufacturing Co., Inc. is classified as a minor facility because Noffsinger Manufacturing Co., Inc.'s potential to emit is less than major source thresholds without requiring limits on its potential to emit. The AIRS classification is B.

The facility is located within AQCR 63 and UTM zone 11. The facility is located in Twin Falls County which is designated as unclassifiable for all regulated criteria pollutants (PM₁₀, CO, NO_x, SO₂, lead, and ozone).

The AIRS classification did not change as a result of this permit transfer.

4. APPLICATION SCOPE

The purpose of this application was to change the name and ownership from Acme Manufacturing Company, Inc. to Noffsinger Manufacturing Co., Inc. To simplify future permit compliance, existing applicable permits were consolidated into one PTC. The following table lists the permits that were reviewed in this consolidation process and the applicability determination that was made.

Permit Number	Date	Permit Applicability Determination
1480-0016	July 1, 1978	Expired at midnight on June 30, 1983.
1480-0050	April 9, 1991	Pages 2 and 3 replaced by PTC issued on August 9, 1991.
1480-0050	August 9, 1991	Pages 2 and 3 replaced by PTC issued on September 26, 1991.
1480-0003	September 26, 1991	Applicable.
083-00058	December 27, 1994	Replaced by PTC issued February 16, 1996.
083-00058	February 16, 1996	Applicable.

4.1 Application Chronology

July 12, 2005	DEQ received application.
May 10, 2006	DEQ determined the application complete.

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this PTC action.

5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC.

IDAPA 58.01.01.201 Permit to Construct Required

The facility's proposed project does not meet the permit to construct exemption criteria contained in Sections 220 through 223 of the Rules. Therefore, a PTC is required.

IDAPA 58.01.01.209 Procedure for Issuing Permits

The transfer of permits meets the requirements for revisions to permits to construct and therefore has been permitted in accordance with IDAPA 58.01.01.209.04.

IDAPA 58.01.01.224 Permit to Construct Application Fee

The applicant is exempt from the PTC application fee requirement in accordance with subsection 03.

IDAPA 58.01.01.225 Permit to Construct Processing Fee

The applicant is exempt from the PTC processing fee requirement.

5.5 Permit Conditions Review

This section describes only those permit conditions that have been revised, modified or deleted as a result of this permit action. All other permit conditions remain unchanged. The two substantive changes are from Acme Manufacturing Company to Noffsinger Manufacturing Co., Inc., and from Scott McDowell as the responsible official, and person to contact to Ronald E. Beaumont.

6. PERMIT FEES

In accordance with IDAPA 58.01.01.224.03, an application fee was not required with this PTC application submittal.

In accordance with IDAPA 58.01.01.225, a processing fee is not required and no assessment will be issued by DEQ.

7. PERMIT REVIEW

7.1 Regional Review of Draft Permit

Since there are no significant changes to the substance of this PTC, there was no Regional Office review.

7.2 Facility Review of Draft Permit

The facility did not request a review of the draft permit.

7.3 Public Comment

In accordance with IDAPA 58.01.01.209.04, no opportunity for public comment is required.

8. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommends that Noffsinger Manufacturing Co., Inc. be issued a final PTC No. P-050417 for the change in ownership. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

NBD/bf Permit No. P-050417

G:\Air Quality\Stationary Source\SS Ltd\PTC\Noffsinger\Final\P-050417_Noffsinger_SB.doc